

**NATALIE K. WIGHT, OSB #035576**

United States Attorney

District of Oregon

**MICHAEL J. JETER, OSB #165413**

Assistant United States Attorney

[michael.jeter@usdoj.gov](mailto:michael.jeter@usdoj.gov)

1000 SW Third Avenue, Suite 600

Portland, Oregon 97204-2936

Telephone: (503) 727-1000

*Attorneys for the United States*

**UNITED STATES DISTRICT COURT**

**DISTRICT OF OREGON**

**JANET DOE,**

**Case No. 6:24-cv-00801-MC**

Plaintiff,

**STIPULATED RULE 502(d) ORDER**

v.

**UNITED STATES OF AMERICA;**

**SHAWN GUTIERREZ, an**

**individual; GEORGE FOX**

**UNIVERSITY,**

Defendants.

It is hereby stipulated and agreed by and between the respective parties hereto by their counsel of record that:

1. The production of privileged or work-product protected documents, electronically stored information (“ESI”) or information, whether inadvertent or otherwise, is not a waiver of the privilege or protection from discovery in this case or in any other federal or state proceeding. This Order shall be interpreted to provide the maximum protection allowed by Federal Rule of Evidence 502(d).
2. Nothing contained herein is intended to or shall serve to limit a party’s right to conduct a review of documents, ESI or information (including metadata) for relevance, responsiveness and/or segregation of privileged and/or protected information before production.

DATED: January 8, 2025

/s/ Rhett G. Fraser  
Rhett G. Fraser, OSB No. 091080  
Huegli Fraser Law

/s/ Barbara C. Long  
Barbara C. Long, OSB No. 122428  
Long Law PC  
*Attorneys for Plaintiff*

DATED: January 8, 2025

Natalie K. Wight  
United States Attorney  
District of Oregon

/s/ Michael Jeter  
Michael Jeter, OSB No. 165413  
*Attorneys for Defendant United States of America*

DATED: January 8, 2025

/s/ Melisa A. Button

Melisa A. Button, OSB No. 116113  
Hornecker Cowling LLP  
*Attorney for Defendant George Fox  
University*

DATED: January 8, 2025

/s/ Guy E Keating

Guy E Keating, OSB No. 074367  
Schulte Anderson  
*Attorney for Defendant Shawn  
Gutierrez*

**IT IS SO ORDERED.**

DATED: \_\_\_\_\_

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Judge Michael J. McShane